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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PENDLETON DIVISION

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OREGON FIREARMS FEDERATION,	)
INC., et al.,	)
	) Civil No.
Plaintiffs,	) 2:22-cv-01815-IM
v.	) (Lead Case)
	)
TINA KOTEK, et al.,	) Civil No.
	) 3:22-cv-01859-IM
Defendants.	) (Trailing Case)
	)
	) Civil No.
(Continued)	) 3:22-cv-01862-IM
	) (Trailing Case)
	)
	) Civil No.
	) 3:22-cv-01869-IM
	) (Trailing Case)
	)

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\* VIDEOCONFERENCE \*

DEPOSITION UPON ORAL EXAMINATION  
OF EXPERT

ROBERT J. SPITZER

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Witness located in:

Williamsburg, Virginia

\* All participants appeared via videoconference \*

DATE TAKEN: April 5, 2023  
REPORTED BY: Tia B. Reidt, Washington RPR, CCR #2798  
Oregon #22-0001

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1 \_\_\_\_\_

2 (continued) )

3 MARK FITZ, et al., )

4 Plaintiffs, )

5 v. )

6 ELLEN F. ROSENBLUM, et al., )

7 Defendants. )

8 \_\_\_\_\_

9 KATERINA B. EYRE, et al., )

10 Plaintiffs, )

11 v. )

12 ELLEN F. ROSENBLUM, et al., )

13 Defendants. )

14 \_\_\_\_\_

15 DANIEL AZZOPARDI, et al., )

16 Plaintiffs, )

17 v. )

18 ELLEN F. ROSENBLUM, et al., )

19 Defendants. )

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APPEARANCES

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## EXAMINATION INDEX

EXAMINATION BY:	PAGE
Mr. Williamson	5

## EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGE
EXHIBIT 89	Declaration of Robert J. Spitzer.	10
EXHIBIT 90	National Firearms Act, Hearings before the Committee on Ways and Means House of Representatives, Seventy-Third Congress, Second Session on H.R. 9066, April 16, 18, and May 14, 15, and 16, 1934.	40
EXHIBIT 92	The Hill article titled "What our past tells us about young people and guns" dated 3/28/23.	63

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1 includes historical gun laws. Two of those books  
2 utilize and draw on historical gun law information for  
3 their analysis.

4 It is an approach I have taken in other areas  
5 of study aside from the subject of gun policy. That is  
6 to say looking at legal history, looking at the  
7 Constitution, looking at founding debates, founding  
8 documents, statutory law, case law historically. It's  
9 an approach I have used for other areas of study aside  
10 from this policy area.

11 And within the realm of political science, I'm  
12 a trained political science -- that's what my degree is  
13 in. The utilization of history is an important part of  
14 what political science does, and history and political  
15 science are very closely related in any event. And  
16 part of the -- a subfield of political science is  
17 called American political development or APD. And I'm  
18 someone who identifies with that field of study, which  
19 includes looking at history from various perspectives,  
20 but to inform and understand American political  
21 development and modern public policy and the State.

22 Q. Is there anything else about your professional  
23 history that you want to highlight other than what you  
24 just covered that would be relevant to rendering this  
25 opinion?

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## C E R T I F I C A T E

STATE OF WASHINGTON  
COUNTY OF PIERCE

I, Tia Reidt, a Certified Court Reporter in  
and for the State of Washington, do hereby certify that  
the foregoing transcript of the deposition of ROBERT J.  
SPITZER, having been duly sworn, on April 5, 2023, is  
true and accurate to the best of my knowledge, skill  
and ability. Reading and signing was requested pursuant  
to FRCP Rule 30(e).

IN WITNESS WHEREOF, I have hereunto set my  
hand and seal this 11th day of April, 2023.



/S/ Tia B. Reidt  
Tia B. Reidt, RPR, CCR #22-0001  
NOTARY PUBLIC, State of  
Washington.  
My commission expires  
5/15/2026.